BILL OF COMPLAINT Bo. 10662 Equity.

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Edward E. Crawford, individually, and Francis B. Crawford, Sophia E. Crawford and Margaret M. Crawford, infants, by Edward E. Crawford, their father and next friend.

VS.

Adm A.S. Bowers (widow) and Francis B. Crawford, Sophia E. Crawford and Margaret M. Crawford, infants.

No. 10662 Equity.

In the Circuit Court

for Frederick County.

sitting as a Court

of Equity.

TO THE HONOFABLE THE JUDGES OF SAID COURT.

The Bill of Complaint of Edward M.Crawford, widower of Mary A.Crawford, deceased, and Francis B.Crawford, Sophia E.Crawford and Margaret M.Crawford, infants under the age of 21 years, by Edward E.Crawford, their father and next friend, respectfully represents unto your Honorable Court;-

FIRST. That Michael E.Bowers, late of Frederick County, but now deceased, departed this life on November 26,1922, intestate, whose forst wife's name was Elizabeth Mary Bowers, late of Frederick County, but now deceased, who departed this life in the month of October, 1905, intestate, the said Michael B.Bowers so dying was seized and possesses of a certain piece or parcel of land, lying and being on the East Sauth Street, in FrederickCity, Frederick County, State of Maryland, consisting of a house and lot and described in a deed from Andrew P. Renner and Mary E. Renner, his wife, to the said Michael B. Bowers and Elizabeth Mary Bowers, dated March 4, 1901, and recorded in Liber D. H. H. No. 7 Folic 739, one of the Land Records of Frederick County, Maryland, a certified copy of said deed being herewith filed as a part of this Bill of Complaint, marked Exhibit A.

SECOND; That the said Michael B. Bowers left surviving him at the time of his death the following heirs at law, to wit;-

- (1) A widow, Ada A.S. Bowers, who is an adult residing in Frederick City, Frederick County, State of Maryland.
- (2) Edward E. Crawford, the surviving husband of Mary A. Crawford, now deceased, having departed this life sometime during the month of October, 1911, the only child of the said Michael B. Bowers and Mary E. Bowers, leaving surviving her the following children;-
- (3) Francis B. Crawford, a son, who is an infant under the age of 21 years, Sophia E. Crawford, a daughter, who is an infant under the age of 18 years, and Margaret M. Crawford a daughter who is an infant under the age of 15 years.

THIRD; That the real estate mentioned in Exhibit A is not susceptible of division between the parties there to without loss and injury and that the same should be sold and that it would be to the interest, benefit and advantage of all the parties hereto and especially to said infants, that the same should be sold and the proceeds be divided among the parties hereto, according to the respective rights and interests.

WHEREFORE YOUR COMPLAINANTS PRAY;-

- (a) That the real estate mentioned herein may be sold by decree to be passed by your Honorable Court and that after the payment of the costs and expenses, the proceeds thereof be divided among the heirs according to the respective rights and interests.
- (b) That your complainants may have such other and further relief as the nature and equity of their case may require.

May it please your Honors to grant unto your complainants the writ of subpoens in the usual form, directed against the said Ada A.S. Bowers, widow, and Francis B. Crawford, Sophia E. Crawford and Margaret M. Crawford, infants, all of whom are residents of Frederick County, State of Maryland, commanding them and each of them to be and appear